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**Jonathan Banks**  
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March 12, 2002

Mr. William Caton  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: CC Docket No. 02-35

Dear Mr. Caton:

BellSouth Corporation provided the attached written materials concerning change management to the Department of Justice on March 11, 2002.

In accordance with Section 1.1206, I am filing two copies of this notice and the accompanying attachments and request that you place them in the record of the proceeding identified above. Thank you.

Sincerely,



Jonathan B. Banks

Attachments

cc: Renee Crittendon  
Ian Dillner  
Daniel Shiman  
Susan Pié  
James Davis-Smith

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# **BellSouth's Change Management Process**

Dennis Davis  
Bennett Ross

March 11, 2002

# FCC's Evaluation of Change Management Plan

- Information is clearly organized and readily accessible
- Competing carriers had substantial input in the design and continued operation of the process
- The plan defines a procedure for the timely resolution of change management disputes
- The availability of a stable testing environment that mirrors production
- The efficacy of the documentation the BOC makes available for the purpose of building an electronic gateway
- Whether the BOC has demonstrated a pattern of compliance with the plan

# Information is Clearly Organized and Readily Accessible

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## ↑ Change Control Website

[www.interconnection.bellsouth.com/markets/lec/ccp](http://www.interconnection.bellsouth.com/markets/lec/ccp)

- Release Notification/Schedule Change Request Log
  - Change Request Forms (Electronic)
  - Change Request Status Updates
  - System Outage Notifications
- Process Document (Including Version History)
  - Meeting Notification and Minutes
  - Monthly Meeting Calendar
- Daily Updates – Activity Log – Emailed & CCP
  - Process Document
  - Version History of Change
- Capacity Measurement Tools
- Quarterly View of Capacity Used (Proposed)

# **Competing Carriers Have Substantial Input in Design and Operation of Process**

- CCP Has Evolved – Numerous Revisions in 2000 and 2001
- Change Management Process Overhauled at CLEC Request
- Multiple Workshops
- CLECs Voted on 67 Revisions to the Process
- Current Process is Result of Input from All CCP Members

# **CCP Contains Clear Escalation & Dispute Resolution Procedures**

- Escalation Process
  - ◆ Description of Process
  - ◆ Limited Usage in 2001
  - ◆ Will Offer Expanded Escalation List (V.P. Operations)
- Dispute Resolution
  - ◆ Mediation
  - ◆ Complaint Process

# **The CAVE Testing Environment Is Stable and Mirrors Production**

- CAVE Used by Nine CLECs and Vendors
  - ★ No Major Issues
- Test Environment Mirrors Production

# **Documentation for Building Gateways is Good**

- **An average of 35 CLECs use EDI Monthly**
- **An average of 65 CLECs use TAG Monthly**



# **BellSouth Has Demonstrated a Pattern of Compliance with the Process**

- Overall Process is Working Well
- CLECs' Claims of "Backlog" Misrepresent the Process
- Change Requests are Handled on a Timely Basis
- Change Requests are Implemented
- Existing and New CCP Performance Measures

# Release Capacity Planning Proposal

- 3-4 Releases Annually
- Type 2,3, and 6 Feature Scheduled Prior to Type 4 & 5
- Provide Release Capacity Measurement Feature  
Prioritization Matrix
- Provide Forecasted Release Capacity
  - ◆ Estimated Capacity Assigned to Types 2-6 Feature  
Provided at Time of Prioritization
  - ◆ Capacity Remaining after Assigning Types 2-6 Used for  
Slotting Types 4s/5s at Time of Prioritization
  - ◆ 50/50 Approximate Capacity Split Between Type 4s  
and 5s, Implement Type 4s/5s w/ 60 Weeks Subject to  
Available Capacity

Provide Features Planned via Release Schedule

Provide Monitoring and Reporting Post-Release Capacity  
Utilization Depicting Actual Capacity Utilized

# PRELIMINARY FEATURE SIZING MODEL FOR CCP PRIORITIZATION PLANNING

<b>CR Number :</b>	<b>DESCRIPTION:</b>		<b>Draft User Requirement: (Y/N)</b>	<b>Synergies with Other Related CRs</b>
<b>Type CR:</b>				
<b>Systems</b>	<b>System impacted Y/N</b>	<b>Level of Work Effort: List Number of Units. (Incremental units in quarters is permissable) 1 Unit=100 Release Cycle Hours</b>	<b>Constraints/ Comments</b>	<b>Integrated Testing Required (Y/N)</b>
<b>LENS</b>				
<b>TAG</b>				
<b>EDI</b>				
<b>LESOG</b>				
<b>LNP</b>				
<b>SGG</b>				
<b>DOM</b>				
<b>Other (List each)</b>				
<b>Total Units</b>				

# CCP Release Capacity Planning Proposal

2/12/02

# **Release Capacity Planning Proposal**

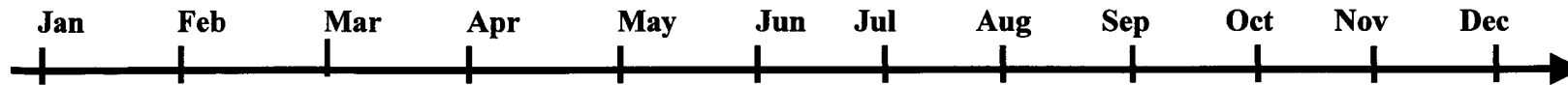
- 3-4 Releases annually (plus maintenance releases)
- Type 2,3,6 Features scheduled prior to Type 4s & 5s
- Provide Release Capacity Measurement Feature Prioritization Matrix (See Release Capacity Measurement Feature Prioritization Matrix Example)
- Provide Forecasted Release Capacity:
  - Estimated capacity assigned to Types 2-6 features provided at time of prioritization (i.e., quarterly)
  - Capacity remaining after assigning Types 2-6 used for slotting Type 4s/5s at time of prioritization
  - 50%/50% approximate capacity split between Type 4s and 5s, implement Type 4s/5s w/i 60 weeks subject to available capacity
- Provide Features planned via Release Schedule. (see CCP Feature Release Implementation Schedule Example)
- Provide Monitoring and Reporting Post-Release Capacity Utilization depicting actual capacity utilized (see Appendix I Example)

# Release Capacity Measurement Feature Prioritization Matrix

<b>CR Number :</b>	<b>DESCRIPTION:</b>		<b>Draft User Requirement: (Y/N)</b>	<b>Synergies with Other Related CRs</b>
<b>Type CR:</b>				
<b>Systems</b>	<b>System impacted Y/N</b>	<b>Level of Work Effort: List Number of Units. (incremental units in quarters is permissible) 1 Unit=100 Release Cycle Hours</b>	<b>Constraints/ Comments</b>	<b>Integrated Testing Required (Y/N)</b>
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<b>LNP</b>				
<b>SGG</b>				
<b>DOM</b>				
<b>Other (List each)</b>				
<b>Total Units</b>				

2002

# CCP Feature Release Implementation Schedule



## ◆◆ 1/5/02 Minor Release 10.3 Production (CAVE)

- Parsed CSR – (CR0369)-2
- Mechanized Line Splitting – (CR0441)-2
- New Install with No Prior Service at Location – (CR0229)- CCP Prioritized April 2001- 4
- Line Splitting-Remove Edit in LMU Prohibiting CLEC from Receiving Loop Data (CR0409)-2
- Mechanized LMU Fix-LFACS/RSAG Address Mismatch Results in Neighborhood Report (CR0422)-2



## ◆◆ 2/2/02 Maintenance Release 10.3.1

- Allow Electronic processing of Unbundled Universal Digital Channel(UDC) Loop Orders-( CCP FTTF)-(CR0557)-2
- Unable to View BTN, PSO, LSF &Directory Information on LENS CSR- (CR0459)-6
- Validation on TN vs Address Req Types A and E (formerly EDI1215990001)-(CR0371)-5
- LENS/TAG miscalculation of UNE P Due Dates -(CR0520) -6
- Enhancements to hunting-(CR0606)-4
- Phase 1-Order Tracking-(CR0040)-CCP Prioritized April 2001-#1-5



## ◆◆ 3/23/02-3/234/02 Minor Release 10.4 Production

- SI Enhancement for SL1, SL2, DS0, DS1 and ISDN -(CR0016)-CCP Prioritized April 2001 -5
- Flow thru Request Type CB, Act of P and Q-(CR137)-CCP Prioritized April 2001 -2,5
- Remove a TN from a LENS LSR-(CR0145)-CCP Prioritized April 2001 -4
- Add Ability to Create New Listings in LENS-(CR0096)- CCP Prioritized April 2001-5
- Local Service Freeze-(CR )-2

"TARGETED" - the planning work to include this item in the indicated release is ongoing. A final determination as to whether the item will be included in the release has not been made. Factors such as regulatory mandates, information uncovered in further planning efforts, or other unforeseen circumstances may impact whether the item will be included in the indicated release.



## ◆◆ 5/18/02-5/19/02 Minor Release 10.5 Production (CAVE)

- LSRs in Q Status-Do Not Display Error Message on SUPP- CCP/FTTF -(CR 0494)-2
- Provide CFA via pre-order (formerly TAG0812990001)- (CR 0368)-CCP Prioritized April 2001 - 5
- Change Main Account Number-(CR0365)-CCP Prioritized April 2001 -5
- Extended Loops (EELS)-(CR0078)-CCP Prioritized April 2001 -2,5
- View Multiple CSR s Simultaneously-(CR0020)-CCP Prioritized April 2001 -5
- TOS Field on REQ TYP J-(CR0038)-CCP Prioritized April 2001 -4



## ◆◆ 7/13/02-7/14/02 Minor Release 10.6 Production

- Partial Migration of UNE Loops (REQ TYP A)-(CR0029)-CCP Prioritized April 2001-2,4
- CN Returned on Incorrect LSR Version-(CR0241)- CCP Prioritized April 2001-5
- Allow Changes in Directory Deliveries-(CR0196)-CCP Prioritized April 2001-4



## ◆◆ 11/16/02 – 11/17/02 Major Release 11. Production (CAVE)

- TARGETED ITEM-UNE to UNE Bulk Migrations- CR0215- CCP Prioritized April 2001-5
- TARGETED ITEM-Phase 2-Order Tracking CCP Prioritized April 2001-5

### LEGEND

- Underlined and Not Bold = Completed Release Cycle

- **Bold** = Release Cycle in progress

- *Italicized and not Bold* = Release Cycle not in progress

-NOTE: Feature justification are in parentheses:

Mandates= Type 2 , Standards = Type 3, BST Initiated CR = Type 4, CLEC Initiated CR= Type 5

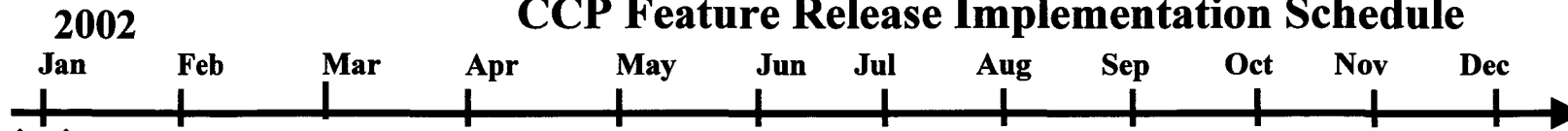
(CAVE) = Must be tested in CAVE prior to this date:4wks Major/2wks Minor if applicable; CLEC Testing will begin on the Monday following CAVE implementation

## **Appendix I: Monitoring and Reporting Post-Release Capacity Utilization**

[illegible]



# CCP Feature Release Implementation Schedule



## 1/5/02 Minor Release 10.3 Production (CAVE)

- Parsed CSR – (CR0369)-2
- Mechanized Line Splitting – (CR0441)-2
- New Install with No Prior Service at Location – (CR0229)- CCP Prioritized April 2001- 4
- Line Splitting-Remove Edit in LMU Prohibiting CLEC from Receiving Loop Data (CR0409)-2
- Mechanized LMU Fix-LFACS/RSAG Address Mismatch Results in Neighborhood Report (CR0422)-2

## 2/2/02 Maintenance Release 10.3.1

- Allow Electronic processing of Unbundled Universal Digital Channel(UDC) Loop Orders-( CCP FTTF)-(CR0557)-2
- Unable to View BTN, PSO, LSF & Directory Information on LENS CSR- (CR0459)-6
- Validation on TN vs Address Req Types A and E (formerly EDI1215990001)-(CR0371)-5
- LENS/TAG miscalculation of UNE P Due Dates -(CR0520) -6
- Enhancements to hunting-(CR0606)-4
- Phase 1a-Order Tracking-(CR0040)-CCP Prioritized April 2001-#1-5

## 3/23/02-3/24/02 Minor Release 10.4 Production

- **SI Enhancement for SL1, SL2, DS0, DS1 and ISDN -(CR0016)-CCP Prioritized April 2001 -5**
- **Flow thru Request Type CB, Act of P and Q-(CR137)-CCP Prioritized April 2001 -2,5**
- **Remove a TN from a LENS LSR-(CR0145)-CCP Prioritized April 2001 -4**
- **Add Ability to Create New Listings in LENS-(CR0096)- CCP Prioritized April 2001-5**
- **Local Service Freeze-Availability for REQ TYP M Non-Complex (CR0657)-2**
- **Single C-2**
- **TARGETED-Parsed CSR - Hunting (CR0651)-5**
- **TARGETED-Phase 1b-Order Tracking-(CR0040)-CCP Prioritized April 2001-#1-5**

## 5/18/02-5/19/02 Minor Release 10.5 Production (CAVE)

- **LSRs in Q Status-Do Not Display Error Message on SUPP- CCP/FTTF -(CR 0494)-2**
- **Provide CFA via pre-order (formerly TAG0812990001)- (CR 0368)-CCP Prioritized April 2001 - 5**
- **Change Main Account Number-(CR0365)-CCP Prioritized April 2001 -5**
- **Extended Loops (EELS)-(CR0078)-CCP Prioritized April 2001 -2,5**
- **View Multiple CSR s Simultaneously-(CR0020)-CCP Prioritized April 2001 -5**
- **TOS Field on REQ TYP J-(CR0038)-CCP Prioritized April 2001 -4**
- **TARGETED-Phase 2a-Order Tracking-(CR0040)-CCP Prioritized April 2001-#1-5**

## LEGEND

- Underlined and Not Bold = Completed Release Cycle

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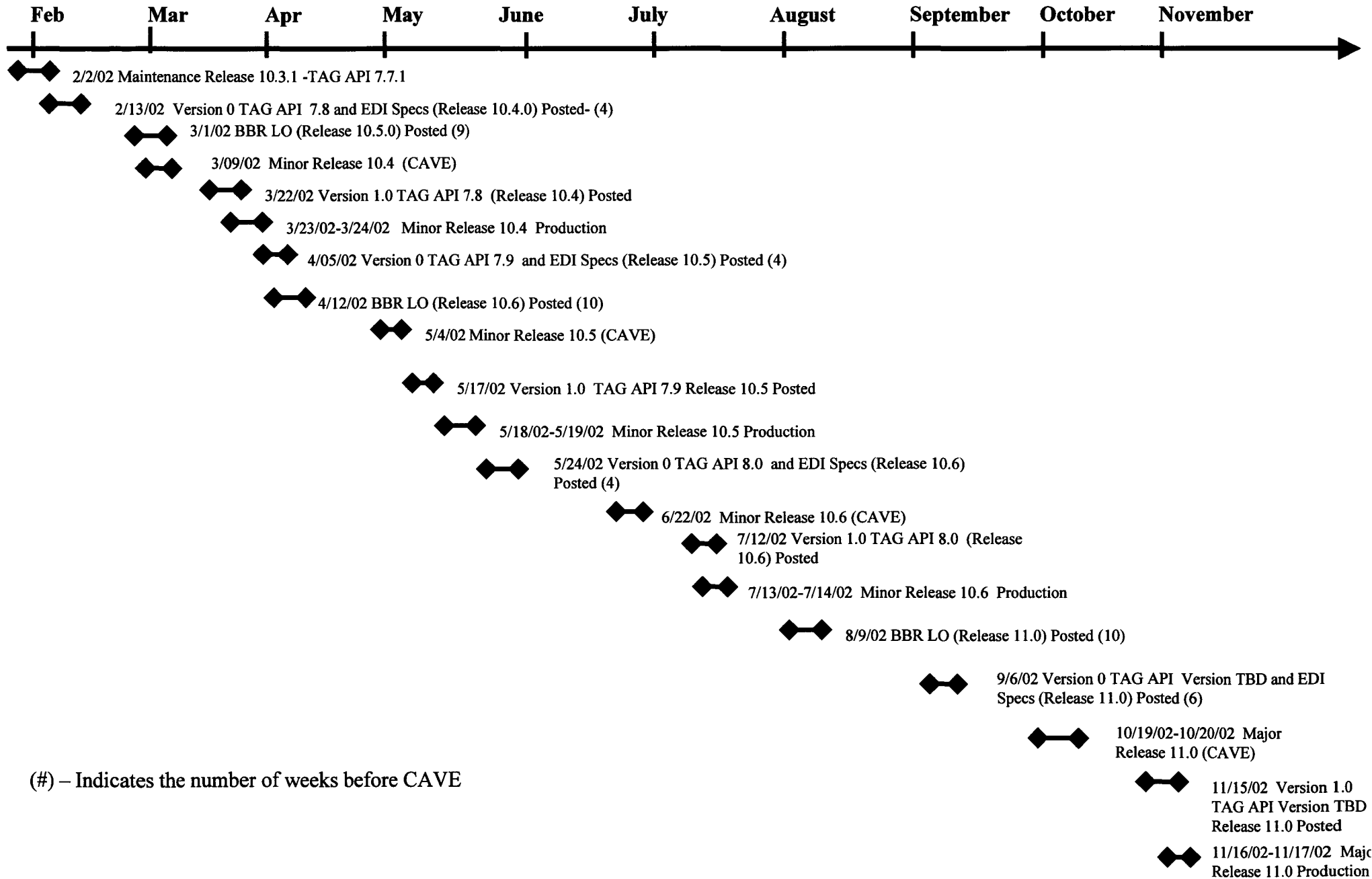
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- **CN Returned on Incorrect LSR Version-(CR0241)- CCP Prioritized April 2001-5**
- **Allow Changes in Directory Deliveries-(CR0196)-CCP Prioritized April 2001-4**

## 11/16/02 – 11/17/02 Major Release 11.0.Production (CAVE)

- **UNE to UNE Bulk Migrations-CR0215- CCP Prioritized April 2001-5**
- **ACT of T- CR0228-2,4**
- **LENS to Flow-Thru Coin LSRs-CR0492-2**
- **Phase 2b-Order Tracking CCP Prioritized-(CR0040)- April 2001-5**

# 1<sup>st</sup> – 4<sup>th</sup> Quarter Release Deliverables

2002



(#) – Indicates the number of weeks before CAVE